



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C96

Category: Asbestos
EPA Office: SSCD
Date: 06/14/1991
Title: Laundering of Asbestos-Contaminated Clothing
Recipient: Homer, Douglas, Afftrex Ltd.
Author: Rasnic, John B., Sscd

Subparts: Part 61, M, Asbestos

Abstract:

The asbestos NESHAP does not apply to the laundering of asbestos- contaminated clothing, although OSHA regulations apply. The disposal of asbestos-contaminated clothing, contaminated by a source or activity subject to the asbestos NESHAP would be subject to the waste disposal requirements of the rule.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 14 1991

OFFICE OF
AIR AND RADIATION

Mr. Douglas Homer
Radiation Safety Officer
Afftrex Ltd.
600 State Street
Suite 201
Clairton, Pennsylvania 15025-1800

Dear Mr. Homer:

This is in response to your April 26, 1991 letter requesting an interpretation of the applicability of the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) to the laundering of asbestos-contaminated clothing.

The Asbestos NESHAP does not apply to the laundering of asbestos-contaminated clothing. However, the disposal of asbestos- contaminated clothing which is contaminated by a source or activity subject to the Asbestos NESHAP would be subject to the waste disposal requirements of the rule. Although the laundering of contaminated clothing is not subject to the Asbestos NESHAP, this activity is subject to the Occupational Safety and Health Administration's (OSHA)-requirements in 29 CFR Section 1926.58(i). EPA recommends that asbestos contaminated clothing be treated as asbestos-containing waste material. That is, we recommend that the contaminated clothing be adequately wetted, and sealed in leaktight containers before being transported to the laundering facility. In addition, OSHA requires that asbestos- contaminated clothing be transported in sealed impermeable bags or other closed impermeable containers and be labeled in accordance with the requirements in 29 CFR Section 1926.58(k).

This determination has been coordinated with EPA's Office of Enforcement and with the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please contact Scott Throwe of my staff at (703) 308-8699.

Sincerely,

John B. Rasnic, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards